

EXHIBIT A

GEORGIA, FULTON COUNTY

DO NOT WRITE IN THIS SPACE

STATE COURT OF FULTON COUNTY
Civil Division

CIVIL ACTION FILE NO. _____

Theresa C. Poole

Plaintiff's Name, Address, City, State, Zip Code

vs.

Terry Lowery et al.

Defendant's Name, Address, City, State, Zip Code

TYPE OF SUIT	AMOUNT OF SUIT
<input type="checkbox"/> ACCOUNT	PRINCIPAL \$ _____
<input type="checkbox"/> CONTRACT	
<input type="checkbox"/> NOTE	INTEREST \$ _____
<input type="checkbox"/> TORT	
<input type="checkbox"/> PERSONAL INJURY	ATTY. FEES \$ _____
<input type="checkbox"/> FOREIGN JUDGMENT	
<input type="checkbox"/> TROVER	COURT COST \$ _____
<input type="checkbox"/> SPECIAL LIEN	

<input checked="" type="checkbox"/> NEW FILING	
<input type="checkbox"/> RE-FILING: PREVIOUS CASE NO. _____	

SUMMONS

TO THE ABOVE NAMED-DEFENDANT:

You are hereby required to file with the Clerk of said court and to serve a copy on the Plaintiff's Attorney, or on Plaintiff if no Attorney, to-wit:

Name: Quinton S. SeayAddress: 260 Peachtree Street Suite 1001City, State, Zip Code: Atlanta GA 30303Phone No.: 404 637 0240

An answer to the complaint which is herewith served on you, within thirty (30) days after service on you, exclusive of the day of service. If you fail to do so, judgment by default will be taken against you for the relief demanded in the complaint, plus cost of this action. **DEFENSE MAY BE MADE & JURY TRIAL DEMANDED**, via electronic filing through eFileGA via www.eFileGA.com or, if desired, at the e-filing public access terminal in the Clerk's Office at 185 Central Ave., S.W., Room TG100, Atlanta, GA 30303.

3/24/2016 1:56:34 PM

This _____


Cicely Barber, Chief Clerk (electronic signature)

If the sum claimed in the suit, or value of the property sued for, is \$300.00 or more Principal, the defendant must admit or deny the paragraphs of plaintiff's petition by making written Answer. Such paragraphs not denied will be taken as true. If the plaintiff's petition is sworn to, or if suit is based on an unconditional contract in writing, then the defendant's answer must be sworn to.

If the principal sum claimed in the suit, or value of the property sued for, is less than \$300.00, and is on a note, unconditional contract, account sworn to, or the petition sworn to, defense must be made by filing a sworn answer setting up the facts relied on as a defense.

SERVICE INFORMATION:

Served, this _____ day of _____, 20____.

DEPUTY MARSHAL, STATE COURT OF FULTON COUNTY

WRITE VERDICT HERE:

We, the jury, find for _____

This _____ day of _____, 20____. _____ Foreperson

(STAPLE TO FRONT OF COMPLAINT)

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as :
 the Administratrix of the Estate of KEVIN :
 MILLER and as the Next Friend of ZION :
 C. MILLER, a minor, :

Plaintiff, :

vs. :

TERRY LOWERY, WESTERN FLYER :
 EXPRESS, LLC, R.W. TIMMS LEASING, :
 LLC, GREAT WEST CASUALTY :
 COMPANY AND STOUGHTON :
 TRAILERS, LLC, :

Defendants. :

CIVIL ACTION

FILE NO. _____

COMPLAINT FOR DAMAGES

COMES NOW, Theresa C. Poole, Plaintiff in the above-styled action and files this, her
 Complaint for Damages, showing the Court as follows:

PARTIES, JURISDICTION AND VENUE

1.

Theresa C. Poole appears as the Plaintiff herein in her capacities as the Administratrix of
 the Estate of Kevin Miller, deceased, and as the Next Friend of Zion C. Miller, a minor. Plaintiff
 is a resident of the state of Georgia.

2.

Defendant Terry Lowery is a resident of the state of North Carolina. Defendant Lowery
 is subject to the jurisdiction of this Court and may be served with a copy of the Summons and
 Complaint at his place of residence, located at 7313 Pebblestone Drive, Charlotte, North

Carolina 28212 or through the office of the Georgia Secretary of State pursuant to the Non-Resident Motorist Act, O.C.G.A. § 40-12-1.

3.

Defendant Western Flyer Express, LLC (hereinafter “Western Flyer”) is a corporation which exists under the laws of the state of Oklahoma. Defendant Western Flyer is subject to the jurisdiction of this Court and may be served with a copy of the Summons and Complaint through William Hall, Jr., its registered agent for service of process, who is located at 100 North Broadway, Suite 1700, Oklahoma City, Oklahoma 73102 or through the Georgia Secretary of State’s Office pursuant to the Non-Resident Motorist Act, O.C.G.A. § 40-12-1. Defendant Western Flyer’s principal place of business is located at 5204 West I-40 Service Road, Oklahoma City, Oklahoma 73128.

4.

Defendant R.W. Timms Leasing, LLC (hereinafter “RWT”) is a limited liability company which exists under the laws of the state of Oklahoma. Defendant RWT is subject to the jurisdiction of this Court and may be served with a copy of the Summons and Complaint through William Hall, Jr., its registered agent for service of process, who is located at 100 North Broadway, Suite 1700, Oklahoma City, Oklahoma 73102 or through the Georgia Secretary of State’s Office pursuant to the Non-Resident Motorist Act, O.C.G.A. § 40-12-1. Defendant RWT’s principal place of business is located at 5204 West I-40 Service Road, Oklahoma City, Oklahoma 73128.

5.

Defendant Great West Casualty Company (hereinafter “Great West”) appears herein as a Defendant under Georgia’s direct action statutes, O.C.G.A. §§ 40-1-112 and 40-2-140 as the

insurer for Defendants Lowery, RWT and Western Flyer. Defendant Great West is a corporation which exists under the laws of the state of Nebraska, is subject to the jurisdiction of this Court and may be served with a copy of the Summons and Complaint through its registered agent for service of process, Corporation Service Company, located at 40 Technology Parkway South #300, Gwinnett, Georgia 30092. At all times relevant to this action, Defendant Great West had a sales agent present in the state of Georgia.

6.

Defendant Stoughton Trailers, LLC (hereinafter "Stoughton") is a limited liability company which exists under the laws of the state of Wisconsin. Defendant Stoughton is subject to the jurisdiction of this Court and may be served with a copy of the Summons and Complaint through its registered agent for service of process, April Welch, who is located at 416 South Academy Street, P.O. Box 606, Stoughton, Wisconsin 53589-0606. Defendant Stoughton's principal place of business is located at 416 South Academy Street, P.O. Box 606, Stoughton, Wisconsin 53589. At all times relevant to the motor vehicle accident which forms the basis of Plaintiff's Complaint for Damages, Defendant Stoughton conducted business, maintained an office and had a sales representative in the state of Georgia.

7.

The Court may exercise jurisdiction over subject matter of this lawsuit and venue is properly laid in this Court as to each of the Defendants.

8.

Jurisdiction and venue are not proper by removal in the United States District Courts because one or more of the Defendants resides, conducts business, maintains an office or has/had a sales representative in the state of Georgia and complete diversity is lacking.

FACTS

9.

At all times relevant to the motor vehicle accident which forms the subject matter of this lawsuit, Defendants Western Flyer and RWT owned and operated a 2013 FRHT tractor vehicle bearing VIN 1FUJGLDR1DSBT3527, which carried an Oklahoma license tag number 2SL349. Defendant Western Flyer also owned and operated a trailer which carried an Oklahoma license tag number of 4274KG.

10.

The tractor and trailer driven by Defendant Lowery and owned and operated by Defendants Western Flyer and RWT were, at all times relevant to this lawsuit, insured by Defendant Great West Casualty under policy number MCP11336A.

11.

At all times relevant to this lawsuit, Defendant Terry Lowery was employed by Defendants Western Flyer and RWT as an over-the-road, long-haul truck driver.

12.

At all times relevant to the motor vehicle accident which forms the basis of Plaintiff's Complaint, Defendant Great West was the liability insurance carrier for Defendants Lowery, Western Flyer and RWT.

13.

The trailer that was involved in the subject motor vehicle accident was designed, manufactured, and placed into the stream of commerce by Defendant Stoughton.

14.

On or about March 20, 2015, Plaintiff's decedent, Kevin Miller, was traveling southbound on Interstate 285 within the city limits of Atlanta, Georgia. When the traffic in the lane which Mr. Miller was traveling stopped suddenly, he was unable to avoid colliding with the rear of the trailer that was being pulled by the tractor being driven by Defendant Lowery. At the time of the collision, Mr. Miller's vehicle was traveling no faster than 38 miles per hour. However, the rear underride guard of the trailer that was being towed by Defendant Lowery failed to prevent Mr. Miller's vehicle from under-riding the rear of the trailer. In fact, the underride guard suffered a catastrophic failure and completely detached from the rear of the trailer. Consequently, Mr. Miller was essentially decapitated and killed.

15.

Just prior to the collision, Defendant Lowery was using his "Jake brake" (engine braking) rather than his regular brakes to stop his truck. The use of the Jake brake rather than the regular brakes prevented other motorists, including Mr. Miller, from knowing that Defendant Lowery was slowing or stopping his vehicle.

COUNT I

LIABILITY OF DEFENDANT LOWERY

16.

Plaintiff adopts and incorporates by reference paragraphs 1 through 15 of her Complaint for Damages as if said paragraphs are set forth fully herein with respect to Count 1 of her Complaint.

17.

On or about March 20, 2015, Defendant Terry Lowery was operating a tractor trailer rig owned by his employer, Defendant Western Flyer in the southbound lane of Interstate 285 (I-285) in Fulton County, Georgia. Despite the fact that it was dark and there was a significant volume of traffic, Defendant Lowery was using his “Jake brake” rather than his regular brakes. Because he was engine braking rather than using the regular brakes, the brake lights on the tractor trailer rig driven by Defendant Lowery were not activated to warn other motorists, including Plaintiff’s decedent, that Defendant Lowery was slowing or stopping the vehicle. Thus, Plaintiff’s decedent was unaware that Defendant Lowery was slowing or bringing the tractor trailer rig to complete stop and was unable to avoid striking the rear of the trailer. Mr. Miller’s vehicle under rode the rear of the trailer and he was catastrophically injured and ultimately died.

18.

The collision between Mr. Miller’s vehicle and the rear of the trailer was actually and proximately caused by the negligence of Defendant Lowery in attempting to use engine braking rather than using his regular brake during nighttime conditions with significant traffic.

19.

As an actual and proximate consequence of the negligence of Defendant Lowery, Plaintiff’s decedent, Kevin Miller, was catastrophically injured and ultimately died. Moreover, Mr. Miller’s estate incurred significant expenses, including medical expenses and funeral and burial expenses in an amount not less than \$8,488.22.

COUNT II

VICARIOUS LIABILITY OF DEFENDANT WESTERN FLYER

20.

Plaintiff adopts and incorporates by reference paragraphs 1 through 19 of her Complaint for Damages as if said paragraphs are set forth fully herein with respect to Count II of her Complaint.

21.

At all times relevant to the motor vehicle accident which forms the basis of Plaintiff's Complaint for Damages, Defendant Lowery was employed by Defendant Western Flyer as an over-the-road, long-haul trucker.

22.

Prior to and at the time of the motor vehicle accident which forms the basis of Plaintiff's Complaint for Damages, Defendant Lowery was acting within the course and scope of his employment with Defendant Western Flyer. Accordingly, Defendant Western Flyer is vicariously liable for the negligent conduct of Defendant Lowery under the doctrine of *Respondeat Superior*.

COUNT III

LIABILITY OF DEFENDANT WESTERN FLYER

23.

Plaintiff adopts and incorporates by reference paragraphs 1 through 22 of her Complaint for Damages as if said paragraphs are set forth fully herein with respect to Count III of her Complaint.

24.

Prior to the motor vehicle accident which forms the subject matter of Plaintiff's Complaint for Damages, Defendant Western Flyer negligently failed to properly train and supervise Defendant Lowery. Specifically, Defendant Western Flyer failed to train and supervise Defendant Lowery with respect to proper braking techniques during highway conditions that included limited nighttime vision and significant traffic volume. Defendant Great Western negligently failed to train and supervise Defendant Lowery that he should not use engine braking rather than his regular brakes during conditions such as those that prevailed on the night of the subject motor vehicle accident.

25.

Prior to the motor vehicle accident which forms the basis of Plaintiff's Complaint for Damages, Defendant Western Flyer negligently failed to maintain the trailer and its underride guard in a condition that was compliant with applicable federal regulations, including but not limited to FMVSS 224 and 49 C.F.R. § 571.223. As a result of Defendant Western Flyer's failure to maintain it, the rear underride guard was unable to prevent Mr. Miller's vehicle from under riding the trailer. Although Mr. Miller's vehicle was traveling no faster than 38 miles per hour at impact, the underride guard suffered a catastrophic failure and completely detached from the rear of the trailer.

26.

As an actual and proximate consequence of Defendant Western Flyer's negligent training and supervision of Defendant Lowery and failure to maintain the trailer and its underride guard, Plaintiff's decedent suffered catastrophic injuries, died and incurred significant medical, burial and funeral expenses in an amount not less than \$8,488.22

COUNT IV

LIABILITY OF DEFENDANT R.W. TIMMS LEASING, LLC

27.

Plaintiff adopts and incorporates by reference paragraphs 1 through 26 of her Complaint for Damages as if said paragraphs are set forth fully herein with respect to Count IV of her Complaint.

28.

Prior to the motor vehicle accident which forms the subject matter of Plaintiff's Complaint for Damages, Defendant RWT negligently failed to properly train and supervise Defendant Lowery. Specifically, Defendant RWT failed to train and supervise Defendant Lowery with respect to proper braking techniques during highway conditions that included limited nighttime vision and significant traffic volume. Defendant RWT negligently failed to supervise and train Defendant Lowery that he should not use engine braking rather than his regular brakes during conditions that prevailed on the night of the subject motor vehicle accident.

29.

Prior to the motor vehicle accident which forms the basis of Plaintiff's Complaint for Damages, Defendant RWT negligently failed to maintain the trailer and its underride guard in a condition that was compliant with applicable federal regulations, including but not limited to FMVSS 224 and 49 C.F.R. § 571.223. As a result of Defendant RWT's failure to maintain it, the rear underride guard was unable to prevent Mr. Miller's vehicle from under riding the trailer. Although Mr. Miller's vehicle was traveling no faster than 38 miles per hour at impact, the underride guard suffered a catastrophic failure and completely detached from the rear of the trailer.

30.

As an actual and proximate consequence of Defendant RWT's negligent training and supervision of Defendant Lowery, Plaintiff's decedent suffered catastrophic injuries, died and incurred significant medical, burial and funeral expenses in an amount not less than \$8,488.22.

COUNT V

LIABILITY OF DEFENDANT GREAT WEST CASUALTY

31.

Plaintiff adopts and incorporates by reference paragraphs 1 through 30 of her Complaint for Damages as if said paragraphs are set forth fully herein with respect to Count V of her Complaint.

32.

At all times relevant to the motor vehicle accident which forms the basis of Plaintiff's Complaint for Damages, Defendant Great West Casualty was the liability insurance carrier for Defendants Lowery, Western Flyer and RWT.

33.

Under Policy No. MCP11336A, Defendant Great West Casualty is required to defend and indemnify Defendants Lowery, Western Flyer and RWT against claims like those asserted herein.

34.

Defendant Great West Casualty is joined herein as a Defendant pursuant to O.C.G.A. §§ 40-1-112 and 40-2-140, Georgia's Direct Action statutes.

COUNT VI

LIABILITY OF DEFENDANT STOUGHTON TRAILERS, LLC

35.

Plaintiff adopts and incorporates by reference paragraphs 1 through 34 of her Complaint for Damages as if said paragraphs are set forth fully herein with respect to Count VI of her Complaint.

36.

The trailer that was involved in the motor vehicle accident of March 20, 2015, including its rear underride device, was designed, manufactured and placed into the stream of commerce by Defendant Stoughton.

37.

Defendant Stoughton negligently designed, manufactured and installed the underride guard in a condition that was inadequate for its intended purpose. The underride guard was not adequate to prevent Mr. Miller's vehicle from under riding the trailer during the subject motor vehicle collision. As such, the underride guard was defective.

38.

As an actual and proximate consequence of Defendant Stoughton's design, manufacture and installation of the underride guard in a defective condition, Plaintiff's decedent, Kevin Miller, suffered catastrophic injuries, died and incurred special damages in amount not less than \$8,488.22.

COUNT VII

PUNITIVE DAMAGES

39.

Plaintiff adopts and incorporates by reference paragraphs 1 through 38 of her Complaint for Damages as if said paragraphs are set forth fully herein with respect to Count VII of her Complaint.

40.

The actions and conduct of the Defendants which form the basis of this lawsuit showed willful misconduct, malice, fraud, wantonness, oppression or that entire want of care which raises the presumption of conscious indifference to the consequences.

41.

Accordingly, Plaintiff is entitled to receive an award of punitive damages sufficient to deter the same or similar conduct by the Defendants in the future.

COUNT VIII

STUBBORN LITIGIOUSNESS BY DEFENDANTS

42.

Plaintiff adopts and incorporates by reference paragraphs 1 through 41 of her Complaint for Damages as if said paragraphs are set forth fully herein with respect to Count VIII of her Complaint.

43.

Defendants have been stubbornly litigious in failing to settle Plaintiff's claims and forcing Plaintiff to file this lawsuit. Accordingly, Plaintiff is entitled to recover reasonable attorney's fees and expenses of litigation under O.C.G.A. § 33-6-11.

WHEREFORE, Plaintiff respectfully prays for the following relief:

- (1) that a copy of the Summons and Complaint be served upon each of the Defendants;
- (2) a trial by a jury of twelve as to each and every appropriate issue;
- (3) a judgment against the Defendants;
- (4) an award of special damages in an amount not less than \$8,488.22;
- (5) an award of general compensatory damages for Plaintiff's decedent, including but not limited to pre-impact shock and fright and conscious mental and physical pain and suffering;
- (6) reasonable attorney's fees and expenses pursuant to O.C.G.A. § 33-6-11;
- (7) that all costs of this action be cast against the Defendants; and
- (8) any and all such further relief as the Court may deem just and appropriate.

This 23rd day of March, 2016.

STEWART SEAY & FELTON, LLC

/s/ Quinton S. Seay
Quinton S. Seay
Georgia Bar No. 634025
Eugene Felton, Jr.
Georgia Bar No. 257840

Attorneys for Plaintiff

260 Peachtree Street
Suite 1001
Atlanta, GA 30303
(404) 637-0240
(404) 637-0241 (Fax)
efelton@ssfjustice.com
qseay@ssfjustice.com

EXHIBIT B

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
 the Administratrix of the Estate of KEVIN
 MILLER and as the Next Friend of ZION C.
 MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
 EXPRESS, LLC, R.W. TIMMS LEASING,
 LLC, GREAT WEST CASUALTY
 COMPANY AND STOUGHTON
 TRAILERS, LLC,

Defendants.

CIVIL ACTION
 FILE NO. 16EV001256

PLAINTIFF'S MOTION FOR APPOINTMENT
 OF A SPECIAL PROCESS SERVER

COMES NOW, the above-referenced Plaintiff, pursuant to O.C.G.A. 9-11-4 (c) and shows this Court that expedited service on Defendant Terry Lowery is necessary and requests the appointment of a special process server to serve Defendant, as authorized under the law.

WHEREFORE, Plaintiff moves this Court for an Order appointing Rob Mellom, an agent of MLQ Attorney Services who is not an interested party to the suit, is a citizen of the United States and 18 years or over, to serve Defendant with process, and to make a return on that service pursuant to O.C.G.A. 9-11-4 (c).

STEWART SEAY & FELTON, LLC

/s/ Quinton S. Seay

Quinton S. Seay

Georgia Bar No. 634025

Attorney for Plaintiff

260 Peachtree Street
 Suite 1001
 Atlanta, GA 30303
 (404) 637-0240
 (404) 637-0241 (Fax)
 qseay@ssfjustice.com

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

ORDER

Upon Motion of the Plaintiff, Theresa Poole, for Appointment of Special Process Server, and it appearing appropriate, just and equitable, it is considered, Ordered and adjudged that Rob Mellom, an agent of MLQ Attorney Services, who is a citizen of the United States and 18 years or over, and is a party having no interest in the above-styled case, is hereby appointed special agent for service of a Summons and Complaint in this case upon the Defendant.

SO ORDERED, this day of _____, 2016.

PRESIDING JUDGE FRED C. EADY
FULTON COUNTY STATE COURT

Presented by:
Quinton S. Seay
260 Peachtree Street
Suite 1001
Atlanta, Ga 30303

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256


AFFIDAVIT OF SPECIAL PROCESS SERVER

Personally appeared before the undersigned officer duly authorized to administer oaths in the State of Georgia, Rob Mellom, who having been duly sworn, deposes and states as follows:

I am Rob Mellom. I am over twenty-one (21) years of age and a citizen of the United States. I am not a felon.

I am a non-party to this action and I am not related by employment or otherwise to Plaintiff, Plaintiff's attorney or Defendants, in the above styled case.

AFFIANT FURTHER SAYETH NOT.


AFFIANT

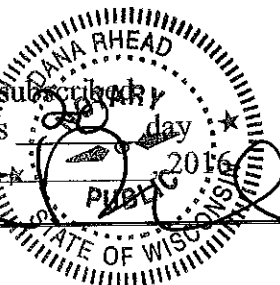
Sworn to and subscribed by

Before me this

day

of June, 2016

Notary Public



IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as :
 the Administratrix of the Estate of KEVIN :
 MILLER and as the Next Friend of ZION C. :
 MILLER, a minor, :

Plaintiff, :

vs. :

TERRY LOWERY, WESTERN FLYER :
 EXPRESS, LLC, R.W. TIMMS LEASING, :
 LLC, GREAT WEST CASUALTY :
 COMPANY AND STOUGHTON :
 TRAILERS, LLC, :

Defendants. :

CIVIL ACTION
 FILE NO. 16EV001256

PLAINTIFF'S MOTION FOR APPOINTMENT
 OF A SPECIAL PROCESS SERVER

COMES NOW, the above-referenced Plaintiff, pursuant to O.C.G.A. 9-11-4 (c) and shows this Court that expedited service on Defendant Terry Lowery is necessary and requests the appointment of a special process server to serve Defendant, as authorized under the law.

WHEREFORE, Plaintiff moves this Court for an Order appointing Lucas Bogk, an agent of MLQ Attorney Services who is not an interested party to the suit, is a citizen of the United States and 18 years or over, to serve Defendant with process, and to make a return on that service pursuant to O.C.G.A. 9-11-4 (c).

STEWART SEAY & FELTON, LLC

/s/ Quinton S. Seay

Quinton S. Seay

Georgia Bar No. 634025

Attorney for Plaintiff

260 Peachtree Street
 Suite 1001
 Atlanta, GA 30303
 (404) 637-0240
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 qseay@ssfjustice.com

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

ORDER

Upon Motion of the Plaintiff, Theresa Poole, for Appointment of Special Process Server, and it appearing appropriate, just and equitable, it is considered, Ordered and adjudged that Lucas Bogk, an agent of MLQ Attorney Services, who is a citizen of the United States and 18 years or over, and is a party having no interest in the above-styled case, is hereby appointed special agent for service of a Summons and Complaint in this case upon the Defendant.

SO ORDERED, this day of _____, 2016.

PRESIDING JUDGE FRED C. EADY
FULTON COUNTY STATE COURT

Presented by:
Quinton S. Seay
260 Peachtree Street
Suite 1001
Atlanta, Ga 30303

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

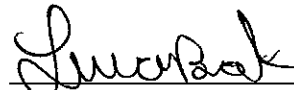
AFFIDAVIT OF SPECIAL PROCESS SERVER

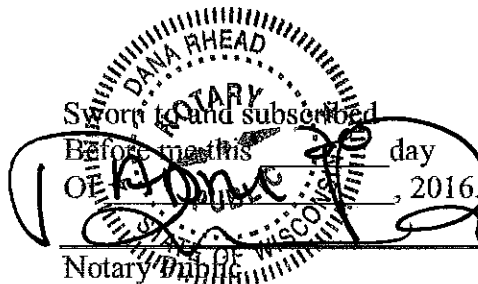
Personally appeared before the undersigned officer duly authorized to administer oaths in the State of Georgia, Lucas Bogk, who having been duly sworn, deposes and states as follows:

I am Lucas Bogk. I am over twenty-one (21) years of age and a citizen of the United States. I am not a felon.

I am a non-party to this action and I am not related by employment or otherwise to Plaintiff, Plaintiff's attorney or Defendants, in the above styled case.

AFFIANT FURTHER SAYETH NOT.


AFFIANT


Notary Public

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
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Defendants.

CIVIL ACTION
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PLAINTIFF'S MOTION FOR APPOINTMENT
OF A SPECIAL PROCESS SERVER

COMES NOW, the above-referenced Plaintiff, pursuant to O.C.G.A. 9-11-4 (c) and shows this Court that expedited service on Defendant Terry Lowery is necessary and requests the appointment of a special process server to serve Defendant, as authorized under the law.

WHEREFORE, Plaintiff moves this Court for an Order appointing Keith Hollen, an agent of MLQ Attorney Services who is not an interested party to the suit, is a citizen of the United States and 18 years or over, to serve Defendant with process, and to make a return on that service pursuant to O.C.G.A. 9-11-4 (c).

STEWART SEAY & FELTON, LLC

/s/ Quinton S. Seay

Quinton S. Seay

Georgia Bar No. 634025

Attorney for Plaintiff

260 Peachtree Street
Suite 1001
Atlanta, GA 30303
(404) 637-0240
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IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
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MILLER, a minor,

Plaintiff,

vs.

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COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

ORDER

Upon Motion of the Plaintiff, Theresa Poole, for Appointment of Special Process Server, and it appearing appropriate, just and equitable, it is considered, Ordered and adjudged that Keith Hollem, an agent of MLQ Attorney Services, who is a citizen of the United States and 18 years or over, and is a party having no interest in the above-styled case, is hereby appointed special agent for service of a Summons and Complaint in this case upon the Defendant.

SO ORDERED, this day of _____, 2016.

PRESIDING JUDGE FRED C. EADY
FULTON COUNTY STATE COURT

Presented by:
Quinton S. Seay
260 Peachtree Street
Suite 1001
Atlanta, Ga 30303

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MILLER and as the Next Friend of ZION C.
MILLER, a minor,

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FILE NO. 16EV001256

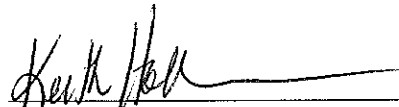
AFFIDAVIT OF SPECIAL PROCESS SERVER

Personally appeared before the undersigned officer duly authorized to administer oaths in the State of Georgia, Keith Hollem, who having been duly sworn, deposes and states as follows:

I am Keith Hollen. I am over twenty-one (21) years of age and a citizen of the United States. I am not a felon.

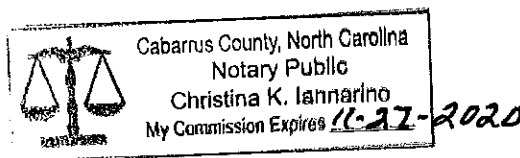
I am a non-party to this action and I am not related by employment or otherwise to Plaintiff, Plaintiff's attorney or Defendants, in the above styled case.

AFFIANT FURTHER SAYETH NOT.


AFFIANT

Sworn to and subscribed
Before me this 4th day
Of APRIL, 2016.

Notary Public



IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

PLAINTIFF'S MOTION FOR APPOINTMENT
OF A SPECIAL PROCESS SERVER

COMES NOW, the above-referenced Plaintiff, pursuant to O.C.G.A. 9-11-4 (c) and shows this Court that expedited service on Defendant Terry Lowery is necessary and requests the appointment of a special process server to serve Defendant, as authorized under the law.

WHEREFORE, Plaintiff moves this Court for an Order appointing Kathy Broom, an agent of MLQ Attorney Services who is not an interested party to the suit, is a citizen of the United States and 18 years or over, to serve Defendant with process, and to make a return on that service pursuant to O.C.G.A. 9-11-4 (c).

STEWART SEAY & FELTON, LLC

/s/ Quinton S. Seay

Quinton S. Seay

Georgia Bar No. 634025

Attorney for Plaintiff

260 Peachtree Street
Suite 1001
Atlanta, GA 30303
(404) 637-0240
(404) 637-0241 (Fax)
qseay@ssfjustice.com

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

ORDER

Upon Motion of the Plaintiff, Theresa Poole, for Appointment of Special Process Server, and it appearing appropriate, just and equitable, it is considered, Ordered and adjudged that Kathy Broom, an agent of MLQ Attorney Services, who is a citizen of the United States and 18 years or over, and is a party having no interest in the above-styled case, is hereby appointed special agent for service of a Summons and Complaint in this case upon the Defendant.

SO ORDERED, this day of _____, 2016.

PRESIDING JUDGE FRED C. EADY
FULTON COUNTY STATE COURT

Presented by:
Quinton S. Seay
260 Peachtree Street
Suite 1001
Atlanta, Ga 30303

IN THE STATE COURT OF FULTON COUNTY
STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

AFFIDAVIT OF SPECIAL PROCESS SERVER

Personally appeared before the undersigned officer duly authorized to administer oaths in the State of Georgia, Kathy Broom, who having been duly sworn, deposes and states as follows:

I am Kathy Broom. I am over twenty-one (21) years of age and a citizen of the United States. I am not a felon.

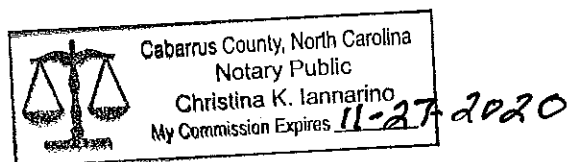
I am a non-party to this action and I am not related by employment or otherwise to Plaintiff, Plaintiff's attorney or Defendants, in the above styled case.

AFFIANT FURTHER SAYETH NOT.


AFFIANT

Sworn to and subscribed
Before me this 4th day
Of APRIL, 2016.

Notary Public



IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

PLAINTIFF'S MOTION FOR APPOINTMENT
OF A SPECIAL PROCESS SERVER

COMES NOW, the above-referenced Plaintiff, pursuant to O.C.G.A. 9-11-4 (c) and shows this Court that expedited service on Defendant Terry Lowery is necessary and requests the appointment of a special process server to serve Defendant, as authorized under the law.

WHEREFORE, Plaintiff moves this Court for an Order appointing Jesse Davis, an agent of MLQ Attorney Services who is not an interested party to the suit, is a citizen of the United States and 18 years or over, to serve Defendant with process, and to make a return on that service pursuant to O.C.G.A. 9-11-4 (c).

STEWART SEAY & FELTON, LLC

/s/ Quinton S. Seay

Quinton S. Seay

Georgia Bar No. 634025

Attorney for Plaintiff

260 Peachtree Street
Suite 1001
Atlanta, GA 30303
(404) 637-0240
(404) 637-0241 (Fax)
qseay@ssfjustice.com

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

ORDER

Upon Motion of the Plaintiff, Theresa Poole, for Appointment of Special Process Server, and it appearing appropriate, just and equitable, it is considered, Ordered and adjudged that Jesse Davis an agent of MLQ Attorney Services, who is a citizen of the United States and 18 years or over, and is a party having no interest in the above-styled case, is hereby appointed special agent for service of a Summons and Complaint in this case upon the Defendant.

SO ORDERED, this day of _____, 2016.

PRESIDING JUDGE FRED C. EADY
FULTON COUNTY STATE COURT

Presented by:
Quinton S. Seay
260 Peachtree Street
Suite 1001
Atlanta, Ga 30303

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION
C. MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

AFFIDAVIT OF SPECIAL PROCESS SERVER

Personally appeared before the undersigned officer duly authorized to administer oaths in the State of Georgia, Jesse Davis, who having been duly sworn, deposes and states as follows:

I am Jesse Davis. I am over twenty-one (21) years of age and a citizen of the United States. I am not a felon.

I am a non-party to this action and I am not related by employment or otherwise to Plaintiff, Plaintiff's attorney or Defendants, in the above styled case.

AFFIANT FURTHER SAYETH NOT.

Jesse H. Davis
AFFIANT

Sworn to and subscribed

Before me this 30 day

Of June 2016.

Notary Public

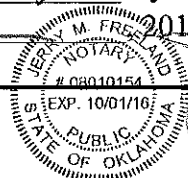


EXHIBIT C

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

Defendants.

CIVIL ACTION
FILE NO. 16EV001256

ORDER

Upon Motion of the Plaintiff, Theresa Poole, for Appointment of Special Process Server, and it appearing appropriate, just and equitable, it is considered, Ordered and adjudged that Keith Hollem, an agent of MLQ Attorney Services, who is a citizen of the United States and 18 years or over, and is a party having no interest in the above-styled case, is hereby appointed special agent for service of a Summons and Complaint in this case upon the Defendant.

SO ORDERED, this day of  2016.

PRESIDING JUDGE FRED C. EADY
FULTON COUNTY STATE COURT

Presented by:
Quinton S. Seay
260 Peachtree Street
Suite 1001
Atlanta, Ga 30303

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

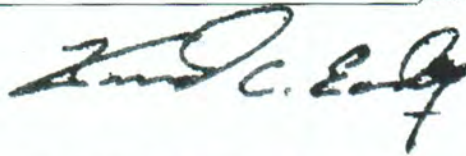
Defendants.

CIVIL ACTION
FILE NO. 16EV001256

ORDER

Upon Motion of the Plaintiff, Theresa Poole, for Appointment of Special Process Server, and it appearing appropriate, just and equitable, it is considered, Ordered and adjudged that Rob Mellom, an agent of MLQ Attorney Services, who is a citizen of the United States and 18 years or over, and is a party having no interest in the above-styled case, is hereby appointed special agent for service of a Summons and Complaint in this case upon the Defendant.

SO ORDERED, this day of _____, 2016.



PRESIDING JUDGE FRED C. EADY
FULTON COUNTY STATE COURT

Presented by:
Quinton S. Seay
260 Peachtree Street
Suite 1001
Atlanta, Ga 30303

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

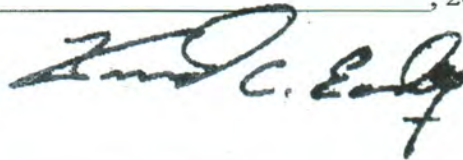
Defendants.

CIVIL ACTION
FILE NO. 16EV001256

ORDER

Upon Motion of the Plaintiff, Theresa Poole, for Appointment of Special Process Server, and it appearing appropriate, just and equitable, it is considered, Ordered and adjudged that Kathy Broom, an agent of MLQ Attorney Services, who is a citizen of the United States and 18 years or over, and is a party having no interest in the above-styled case, is hereby appointed special agent for service of a Summons and Complaint in this case upon the Defendant.

SO ORDERED, this day of _____, 2016.



PRESIDING JUDGE FRED C. EADY
FULTON COUNTY STATE COURT

Presented by:
Quinton S. Seay
260 Peachtree Street
Suite 1001
Atlanta, Ga 30303

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

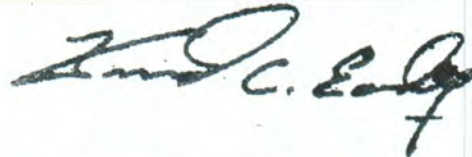
Defendants.

CIVIL ACTION
FILE NO. 16EV001256

ORDER

Upon Motion of the Plaintiff, Theresa Poole, for Appointment of Special Process Server, and it appearing appropriate, just and equitable, it is considered, Ordered and adjudged that Lucas Bogk, an agent of MLQ Attorney Services, who is a citizen of the United States and 18 years or over, and is a party having no interest in the above-styled case, is hereby appointed special agent for service of a Summons and Complaint in this case upon the Defendant.

SO ORDERED, this day of _____, 2016.



PRESIDING JUDGE FRED C. EADY
FULTON COUNTY STATE COURT

Presented by:
Quinton S. Seay
260 Peachtree Street
Suite 1001
Atlanta, Ga 30303

IN THE STATE COURT OF FULTON COUNTY

STATE OF GEORGIA

THERESA C. POOLE, in her capacities as
the Administratrix of the Estate of KEVIN
MILLER and as the Next Friend of ZION C.
MILLER, a minor,

Plaintiff,

vs.

TERRY LOWERY, WESTERN FLYER
EXPRESS, LLC, R.W. TIMMS LEASING,
LLC, GREAT WEST CASUALTY
COMPANY AND STOUGHTON
TRAILERS, LLC,

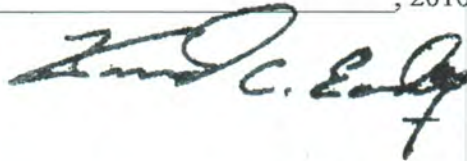
Defendants.

CIVIL ACTION
FILE NO. 16EV001256

ORDER

Upon Motion of the Plaintiff, Theresa Poole, for Appointment of Special Process Server, and it appearing appropriate, just and equitable, it is considered, Ordered and adjudged that Jesse Davis an agent of MLQ Attorney Services, who is a citizen of the United States and 18 years or over, and is a party having no interest in the above-styled case, is hereby appointed special agent for service of a Summons and Complaint in this case upon the Defendant.

SO ORDERED, this day of _____, 2016.



PRESIDING JUDGE FRED C. EADY
FULTON COUNTY STATE COURT

Presented by:
Quinton S. Seay
260 Peachtree Street
Suite 1001
Atlanta, Ga 30303

EXHIBIT D

AFFIDAVIT OF SERVICE

Case: 16EV001256	Court: In the State Court of Fulton County State of Georgia	County:	Job: 887875 (508673)
Plaintiff / Petitioner: Theresa C Poole, ET AL		Defendant / Respondent: Terry Lowery, ET AL	
Received by: Eagle Eye Investigations Group, LLC		For: MLQ	
To be served upon: Terry Lowery			

I, Kathy Broom, being duly sworn, depose and say: I am over the age of 18 years and not a party to this action, and that within the boundaries of the state where service was effected, I was authorized by law to make service of the documents and informed said person of the contents herein

Recipient Name / Address: Terry Lowery Sr. , Home: 7313 Pebblestone Drive Apt B, Charlotte, NC 28212

Manner of Service: Substitute Service - Abode, May 26, 2016, 7:38 am EDT

Documents: Summons and Complaint, Plaintiff's First Continuing Interrogatories to Defendant Great West Casualty Company, Plaintiff's First Continuing Interrogatories to Defendant R.W. Timms Leasing , LLC, Plaintiff's First Continuing Interrogatories to Defendant Stroughton Trailers, LLC , Plaintiff's First Continuing Interrogatories to Defendant Western Flyer Express, LLC, Plaintiff's First Request for Production of Documents to Defendant Great West Casualty Company, Plaintiff's First Request for Production of Documents to Defendant R.W. Timms Leasing LLC, Plaintiff's First Request for Production of Documents to Defendant Stroughton Trailers, LLC, Plaintiff's First Request for Production of Documents to Defendant Western Flyer Express

Additional Comments:

1) Unsuccessful Attempt: May 25, 2016, 8:54 pm EDT at Home: 7313 Pebblestone Drive Apt B, Charlotte, NC 28212

No answer at the door. No cars parked in the designated parking spaces. Neighbor did state someone lives in the apartment but she did not know them and did not know their schedule.

2) Successful Attempt: May 26, 2016, 7:38 am EDT at Home: 7313 Pebblestone Drive Apt B, Charlotte, NC 28212 received by Terry Lowery Jr. for Terry Lowery Sr. . Age: 20; Ethnicity: African American; Gender: Male; Weight: 150; Height: 6'; Hair: Black; Relationship: Son; Served Terry Lowery Jr. the son of Terry Lowery Sr. who is over the age of 18 and resides at the residence. Mr. Lowery Jr stated Mr. Lowery Sr was on the road traveling and he would accept the documents on his behalf.


Kathy Broom 5/27/16
Kathy Broom Date

Eagle Eye Investigations Group, LLC
1409 East Blvd 1-D
Charlotte, NC 28203
704-376-2728

Subscribed and sworn to before me by the affiant who is personally known to me.

Christina K. Iannarino
Notary Public
5-27-16 NOVEMBER 27, 2020
Date Commission Expires

MLQ ATTORNEY SERVICES
2000 RIVEREDGE PARKWAY NW
SUITE 885
ATLANTA, GA 30328
1-800-446-8794

 Cabarrus County, North Carolina
Notary Public
Christina K. Iannarino
My Commission Expires 11-27-2020



508673

EXHIBIT E

AFFIDAVIT OF SERVICE

State of Georgia

County of Fulton

Circuit Court

Case Number: 16EV001256

Plaintiff:

Theresa C. Poole

vs.

Defendant:

Terry Lowery, et al

Received by MLO Attorney Services to be served on **Stoughton Trailers LLC c/o April Welch, 416 S. Academy St., Stoughton, WI 53589.**

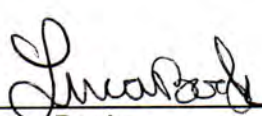
I, Lucas Bogk, being duly sworn, depose and say that on the **31st day of May, 2016** at **2:55 pm**, I:

BUSINESS: served by delivering a true copy of the **Summons, Complaint for Damages, Plaintiffs First Continuing Interrogatories to Defendant Great West Casualty Company, Plaintiffs First Continuing Interrogatories to Defendant R.W. Timms Leasing, LLC, Plaintiffs First Continuing Interrogatories to Defendant Stoughton Trailers, LLC, Plaintiffs First Request for Production of Documents to Defendant Stoughton Trailers, LLC, and Plaintiffs First Request for Production of Documents to Defendant Western Flyer Express, LLC** with the date and hour of service endorsed thereon by me, to: **April Welch as Authorized Agent**, a person employed therein and authorized to accept service for **Stoughton Trailers LLC** at the address of: **416 S. Academy St., Stoughton, WI 53589**, the within named person's usual place of **Work**, in compliance with State Statutes.

I certify that I am an adult over the age of 18, I am a resident of the State of Wisconsin, and I have no interest in the above action. I also certify that at the time of said service, I endorsed upon the copy so served, the date upon which the same was served, the time, place, manner of service and upon whom service was made and signed my name thereto.

Subscribed and sworn to before me on the 1st day of June, 2016 by the affiant who is personally known to me.

NOTARY PUBLIC
STATE OF WISCONSIN
MY COMMISSION EXPIRES: 8/17/17



Lucas Bogk
Process Server

MLO Attorney Services
2000 Riveredge Pkwy. Suite 885
Atlanta, GA 30328
(770) 984-7007

Our Job Serial Number: GWK-2016004757